

Berger, Fischhoff, Simmer, Wexler & Goodman, LLP  
Proposed Attorneys for the Debtor &  
Debtor-in-Possession  
Heath S. Berger, Esq.  
Gary C. Fischhoff, Esq.  
6901 Jericho Turnpike, Suite 230  
Syosset, New York 11791  
(516) 747-1136

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

RUDOLPH W. GIULIANI  
a/k/a RUDOLPH WILLIAM GIULIANI

Chapter 11  
Case No.: 23-12055

Debtor.

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**SUPPLEMENTAL DECLARATION OF ANDREW GIULIANI<sup>1</sup>**

I, Andrew Giuliani, hereby declare pursuant to 28 U.S.C. §1746 that the following statements are true and correct to the best of my knowledge and belief after due inquiry as detailed herein:

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<sup>1</sup> This declaration is premised on the requirements set forth in *Lar Dan Enterprises*, where an insider third party seeks to pay counsel fees of the Debtor. There are five required representations necessary for this declaration. They include: These factors include: (1) the arrangement must be fully disclosed to the debtor/client and the third party payor/insider; (2) the debtor must expressly consent to the arrangement; (3) the third party payor/insider must retain independent legal counsel and must understand that the attorney's duty of undivided loyalty is owed exclusively to the debtor/client; (4) the factual and legal relationship among the third party payor/insider, the debtor, the respective attorneys, and their contractual arrangement concerning the fees, must be fully disclosed to the Court at the outset of the debtor's bankruptcy representation; (5) the debtor's attorney/applicant must demonstrate and represent, to the court's satisfaction, the absence of facts which otherwise create non disinterestedness, actual conflict, or impermissible potential for a conflict of interest. *In re Kelton Motors Inc.*, 109 B.R. at 658.

*In re Lan Dan Enterprises, Inc.*, 221 B.R. 93, 95 (Bankr. S.D.N.Y. 1998)

1. I am son of Rudolph W. Giuliani and the President of Giuliani Defense Fund, which is an FEC political action committee organized on August 4, 2023, to help defray legal and other expenses for Rudolph W. Giuliani, and I have full authority to make this declaration.

2. As President of Giuliani Defense, my responsibilities include general oversight of all aspects of the PAC. Mr. Kiger and myself are the only two individuals managing the PAC. Mr. Kiger is responsible for maintaining the books and records including the issuance of checks. I may, on occasion, receive a check and deposit it into the bank account. Wells Fargo is the sole depository for the entity. I use the title of President but it is not an official title.

3. Since its formation, the Giuliani Defense Fund has paid to the Firm of Camara & Sibley, LLP \$260,000.00 in total for the fees that they have incurred for representing the Debtor including the Freeman case. On September 12, 2023 we sent Camara & Sibley, LLP \$200,000.00 and on November 27, 2023 we sent Camara & Sibley, LLP \$60,000.00 for work on a motion to dismiss on the Hunter Biden case and an additional \$10,000.00 was wired to local counsel in that case. Giuliani Defense waives any and all reimbursement and/or indemnification of the \$260,000.00 paid to Camara & Sibley, LLP and the additional \$10,000.00 to local counsel. Attached as Schedule "A" is a print out from the Federal Election Commission's website listing all receipts and disbursements through December 2023.

4. I understand that the law firm of Camara & Sibley, LLP (the "Firm") is representing the Debtor.

5. I fully understand that the Firm's obligation is solely for the representation of the Debtor to the exclusion of any other entity or individual, including Giuliani Defense.

6. Giuliani Defense will not seek to be reimbursed in the Chapter 11 nor will it file a claim in the Chapter 11 for such advances of monies.

7. Giuliani Defense is not a creditor of the Debtor. Other than assisting the Debtor with payments of legal fees to Camara & Sibley, LLP and other firms, Giuliani Defense has no relationship with the Debtor.

8. Giuliani Defense does not intend to bid on any assets of the Debtor and does not intend to provide any financing to the Debtor beyond the payment of legal fees to Camara & Sibley, LLP or on any other retained professionals whose retention on similar terms has been or will be approved, and from time to time may pay costs, such as, but not limited to, travel and lodging, to support the Debtor's political activities. Giuliani Defense also will not seek reimbursement for any of these payments.

9. Pursuant to 28 U.S.C. §1746 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Andrew Giuliani

Andrew Giuliani

## SCHEDULE A

ITEMIZED RECEIPTS  
All Listed Line Numbers

## Committee: GIULIANI DEFENSE

Contributor's Name	Contributor's Address	Employer/Occupation	Memo/Description	Memo Text Date	Amount (\$)	Aggregate (\$)	Units
Robert Kiger	PO Box 3495 Palm Beach, Florida 33480	FEC Infusion LLC / President	Contributory Loan/Establish Contributory Bank Account	08/04/2023	25.00	25.00	
Robert Kiger	PO Box 3495 Palm Beach, Florida 33480	FEC Infusion LLC / President	Non-Contributory Loan/Establish Non- Contributory Bank Account	08/04/2023	25.00	50.00	
Robert Kiger	PO Box 3495 Palm Beach, Florida 33480	FEC Infusion LLC / President	Non-Contributory Loan/Printing /Intuit Checks	08/28/2023	104.96	154.96	
Eliabeth Ailes	6 Ocean Ln, Palm Beach, Florida 33480	Retired / Retired	Non-Contributory Account Receipt	09/07/2023	100000.00	100000.00	
Garyn Borland	1807 Tahlina Terrance Corona Del Mar, California 32625	Requested / Requested	Non-Contributory Account Receipt	09/07/2023	300000.00	300000.00	
Joan Chin	332 East 84th Street 5G New York, New York 10028	SiriusXM / Radio	Non-Contributory Account Receipt	12/16/2023	208.65	208.65	
Arnold Gumowitz	421 7th Ave. New York, New York 10001	Requested / Requested	Non-Contributory Account Receipt	09/07/2023	50000.00	50000.00	
Holistic Choice Labs	454 Columbia Industrial Blvd #6 Evans, Georgia 30809		Non-Contributory Account Receipt	08/28/2023	10000.00	10000.00	
Vernon Kerry	9343 Rapid Lightning Rd. Sandpoint, Idaho 838644798	Requested / Requested	Non-Contributory Account Receipt	12/27/2023	250.00	250.00	
Damon Kimber	952 Anderson Ave. Bronx, New York 104525602	Requested / Requested	Non-Contributory Account Receipt	12/19/2023	5000.00	5000.00	
Marilyn Krone	5748 Gauglin Ter Palm Beach Gardens, Florida 33415	Requested / Requested	Non-Contributory Account Receipt	09/11/2023	1000.00	1000.00	
James Liautauo	24 Dockside Lane Key Largo, Florida 33307	Requested / Requested	Non-Contributory Account Receipt	09/07/2023	100000.00	100000.00	
Matthew Martorano	420 Rose Garden Ln ALPHARETTA, Georgia 30009	ENTREPRENEUR / ENTREPRENEUR	Non-Contributory Account Receipt	09/05/2023	100000.00	100000.00	
Probitry International Corp.	421 N Beverly Dr Beverly Hills, California 90210		Non-Contributory Account Receipt	09/05/2023	35000.00	35000.00	

Contributor's Complete Name				Amount		Aggregate Limits	
Address				(\$)		(\$)	
Requested / Requested				Text Date			
Nancy Takei	242 E 87th St	Contributory	Account Receipt	12/14/2023	500.00	500.00	
	Apt 5B						
Lewis E. Topper	New York, New York 10128	Self Employed / Executive	Non-Contributory Account Receipt	08/24/2023	25000.00	25000.00	
	212 Tresure Place Jupiter, Florida 33469						

<b>Total Donation Amount (Non-Memo)</b>	<b>\$727113.61</b>
<b>Total Memo Amount</b>	<b>\$0</b>
<b>Number of Transactions (Non-Memo)</b>	<b>16</b>
<b>Number of Transactions (Memo)</b>	<b>0</b>

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 For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: [webmanager@fec.gov](mailto:webmanager@fec.gov).

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

### All Listed Line Numbers

#### Committee: GIULIANI DEFENSE

Disbursement To	Address	Election Type	Date of Disbursement	Extra Description	Amount This Period	Text Memo
Robert Kiger	PO Box 3495 Palm Beach, Florida 33480		09/04/2023	Repay Loan to Non-Contributory Acct For	104.96	
Robert Kiger	PO Box 3495 Palm Beach, Florida 33480		09/05/2023	Repay Loan to Non-Contributory Account F	25.00	
Aidala, Bertuna & Kamins, P.C.	546 Fifth Ave. 6th Floor New York, New York 10036		09/15/2023	Non-Contributory Disbursement/Legal Fees	200000.00	
Berger Fischhoff Shumer LLP	6901 Jericho Turnpike Suite 230 Syosset, New York 11787		12/21/2023	Non-Contributory Disbursement/Legal Fees	30000.00	
Camara & Sibley LLP	1108 Lavaca St Suite 110263 Austin, Texas 78701		09/12/2023	Non-Contributory Disbursement/Legal Fees	100000.00	
Camara & Sibley LLP	1108 Lavaca St Suite 110263 Austin, Texas 78701		09/12/2023	Non-Contributory Disbursement/Legal Fees	100000.00	
Camara & Sibley LLP	1108 Lavaca St Suite 110263 Austin, Texas 78701		11/27/2023	Non-Contributory Disbursement/Legal Fees	60000.00	
FEC Infusion LLC	PO Box 3495 Palm		09/05/2023	Non-Contributory Account Disbursement/Re	1029.90	

## Declaration of Andrew Giuliani Pg 7 of 7

Disbursement To	Address	Disbursement Date	Amount	Extra Description	Text Memo
FEC Infusion LLC	Beach, Florida 33480 PO Box 3495 Palm Beach, Florida 33480	11/01/2023	1596.30	Non-Contributory Account Dispersement/Re	
MailSmart Logistics	P.O. Box 791758 Baltimore, Maryland 21279	12/31/2023	7550.61	Non-Contributory Account Dispersement/Po	
OnPoint	20130 Lakeview Center Plaza Ashburn, Virginia 20147	12/31/2023	367.00	Non-Contributory Account Dispersement/Ma	
Planet Direct	11050 Challenger Court Manassas, Virginia 20109	12/31/2023	3363.30	Non-Contributory Account Dispersement/Po	
Robertson Mailing List Company	113 East Market Street Suite 210 Leesburg, Virginia 20176	12/31/2023	5027.12	Non-Contributory Account Dispersement/Da	
Stockton and Stockton LLC	191 South Main Street Clayton, Georgia 30525	10/24/2023	50000.00	Non-Contributory Disbursement/Legal Fees	
Valley Press	3 Jenner Court Owings Mills, Maryland 21117	12/31/2023	3338.00	Non-Contributory Account Dispersement/Pr	

<b>Total Disbursement Amount (Non-Memo)</b>	<b>562402.19</b>
<b>Total Memo Amount</b>	<b>0</b>
<b>Number of Transactions (Non-Memo)</b>	<b>15</b>
<b>Number of Transactions (Memo)</b>	<b>0</b>